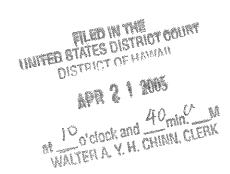
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Attorneys for Plaintiff UNITED STATES OF AMERICA



IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

) CR. NO. URO5-00165
) INFORMATION
() [18 U.S.C. 201(b)(2)(B)]
)
))

INFORMATION

COUNT 1

The United States Attorney charges that:

On or about December 20, 2002, through and including March 14, 2003, within the District of Hawaii, Robert Cruz Aguigui, a public official, directly and indirectly did corruptly demand, seek, receive, accept and agree to receive and accept money personally from an undercover agent, in return for being

influenced to commit, and aid in committing, and to collude in, and allow, any fraud, and make the opportunity for the commission of any fraud, on the United States, to wit: the unauthorized sale of recyclable material from United States Navy Recycling Program.

In violation of Title 18, United States Code, Section 201(b)(2)(B).

COUNT 2

The United States Attorney further charges that:

On or about June 21, 2002 through and including

December 2, 2002, within the District of Hawaii, Robert Cruz

Aguigui, a public official, directly and indirectly did corruptly

demand, seek, receive, accept and agree to receive and accept

money from I.Y.C., in return for being influenced to commit, and

aid in committing, and to collude in, and allow, any fraud, and

make the opportunity for the commission of any fraud, on the

United States, to wit: the unauthorized sale of recyclable

materials from the United States Navy Recycling Program.

In violation of Title 18, United States Code, Section 201(b)(2)(B).

COUNT 3

The United States Attorney further charges that:

On or about July 10, 2000, through and including

October 10, 2003, within the District of Hawaii, Robert Cruz

Aguigui, a public official, directly and indirectly did corruptly demand, seek, receive, accept and agree to receive and accept money personally from W.L., in return for being influenced to commit, and aid in committing, and to collude in, and allow, any fraud, and make the opportunity for the commission of any fraud, on the United States, to wit: the unauthorized sale of recyclable materials from the United States Navy Recycling Program.

In violation of Title 18, United States Code, Section 201(b)(2)(B).

COUNT 4

The United States further charges that:

On or about March 26, 2003, within the District of Hawaii, Robert Cruz Aguigui, a public official, directly and indirectly did corruptly demand, seek, receive, accept and agree to receive and accept money personally from an undercover agent, in return for being influenced to commit, and aid in committing, and to collude in, and allow, any fraud, and make the opportunity for the commission of any fraud, on the United States, to wit: the procurement of a Navy Recycling Program contract, bypassing the competitive bid process and understating the amount of scrap metal agreed to be provided.

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In violation of Title 18, United States Code, Section 201(b)(2)(B).

DATED: APR 21 2005 , at Honolulu, Hawaii.

EDWARD H. KUBO, JR. United States Attorney District of Hawaii

LARRY L. BUTRICK

Assistant U.S. Attorney

Attorneys for Plaintiff UNITED STATES OF AMERICA

<u>United States v. Robert Cruz Aguigui</u> Cr. No.

"Information"

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